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November 24, 2003

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The Honorable Catherine C. Blake
United States District Judge
U. S. District Court for the District of Maryland
U.S. Courthouse
101 West Lombard Street
Baltimore, MD 21201

**RE: *American Sugar Refining Co., Inc. v. M/V ALIANA*
PRINCESS; Case Action No.: CCB-03-CV-329**

Dear Judge Blake:

This letter is a joint request for further extension of the deadlines under the Scheduling Order.

This case concerns damage to one of the Plaintiff's cranes and additional damages relating to the loss of use of that crane for a period of time.

Counsel for Plaintiff has provided documents in support of the claim, but Defendant's counsel has requested some additional documents, which Plaintiff's counsel is now attempting to obtain.

Counsel feel strongly that the case can be resolved without the necessity for formal discovery and the necessity to obtain experts. As the deadline for designating experts is currently November 24, 2003, we would respectfully request that the dates set forth in the Court's paperless Order (document no. 11) filed on September 22, 2003, be moved forward 90 days as follows:

1. Plaintiff's Rule 26(a)(2) disclosures re: experts – February 24, 2004;

*Admitted in the District of Columbia and Maryland

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2. Defendant's Rule 26(a)(2) disclosures re: experts – March 22, 2004;
3. Plaintiff's rebuttal Rule 26(a)(2) disclosure re: experts - April 5, 2004;
4. Rule 26(a)(2) supplementation of disclosures and responses – April 12, 2004;
5. Discovery deadline; submission of status report - May 5, 2004;
6. Request for admission – May 12, 2004; and
7. Dispositive pre-trial motions deadline – June 4, 2004.

All other provisions of the Court's Scheduling Order would remain the same. Thank you for your consideration.

Very truly yours,
/S/
James D. Skeen

cc: Robert B. Hopkins, Esq.
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Jeffrey J. Asperberger, Esq.